



One Barker Avenue
 White Plains, New York 10601
 T 914.821.3075
 reuber@leasonellis.com

February 20, 2024

Cameron S. Reuber
 PARTNER

VIA ECF

The Honorable Valerie Figueredo
 United States District Judge
 Southern District of New York
 500 Pearl Street, Room 17A
 New York, New York
 (212) 805-0298

Re: *Tianhai Lace USA, Inc. v. Zara USA Inc., et al.*, Civ. No. 1:23-cv-6597 (DLC) (VF)

Dear Judge Figueredo:

We submit this letter jointly on behalf of Plaintiff Tianhai Lace USA, Inc. and Defendant Zara USA Inc. regarding the Court's Order, dated December 1, 2023 (Dkt. 21), referring this action to Your Honor for purposes of settlement. The December 1, 2023 Order set a deadline for mediation to be scheduled before Your Honor in the month of February 2024. The parties have exchanged initial discovery requests and are in the process of exchanging an initial production of documents for purposes of facilitating settlement. Because the parties are in the process of exchanging documents to facilitate settlement and ensure any mediation before Your Honor is more fruitful, good cause of an adjournment of the February 2024 deadline set forth in the Court's December 1, 2023 order exists. The parties are both motivated and optimistic that this action will settle in short order. As such, the parties request that the Court adjourn the deadline to conduct mediation before Your Honor to a date after May 1, 2024, a time period agreed upon by both parties. The parties agree to contact Your Honor's chambers by May 1, 2024 to schedule an exact date and time for mediation to take place before Your Honor.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Cameron S. Reuber', is written over a stylized, open signature line. The line is curved and has a decorative flourish at the beginning.

Cameron S. Reuber

c: All Counsel of Record

The 12/1/23 scheduling Order remains in effect, except for paragraph 3. The parties may contact Judge Figueredo at any time to schedule settlement discussions.

*Yours truly
 2/21/24*